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KUIANA TAYLOR

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KUIANA TAYLOR,

Plaintiff,

vs.

CITY AND COUNTY OF SAN
FRANCISCO,

Defendant.

Case No. CV 14 3555 CRB

**STIPULATED MOTION FOR
ADMINISTRATIVE RELIEF; AND
~~[PROPOSED]~~ ORDER ALLOWING PARTIES
TO FILE DISCOVERY LETTER REGARDING
PRODUCTION OF CITY DOCUMENTS AND
IDENTIFICATION OF CITY EMPLOYEES
RECEIVING PUBLIC ASSISTANCE**

Civ. Local Rules 7-11 and 7-12

Plaintiff Kuiana Taylor and Defendant City and County of San Francisco (collectively, “the parties”) hereby move this Court for an order allowing the parties to file a letter brief setting forth the parties' respective positions regarding the production of City documents and identification of City employees in the City’s Jobs Now program, the job program in which Plaintiff participated. In order to qualify for the Jobs Now program, individuals must have received public assistance in the past. It is

the City's position that information identifying employees who are receiving public assistance is protected by California Welfare and Institutions Code section 10850 which makes the disclosure of such information a misdemeanor under California law. It is Plaintiff's position that this information is highly relevant and necessary for Plaintiff to litigate her discrimination and harassment claims against the City because a number of these individuals were witnesses to Plaintiff's alleged harassment and/or alleged similar claims of harassment against Plaintiff's supervisor.

The Parties hereby make this Stipulated Motion for Administrative Relief in order to timely resolve this discovery dispute so that documents can be produced and an initial round of depositions can occur before the Court ordered mediation, currently set for May 20, 2015, takes place. Waiting 35 days to resolve this dispute through formal motion procedures would needlessly delay the process and possibly prevent the parties from adequately preparing for the mediation. Moreover, filing a single letter outlining the parties respective positions will reduce the attorney time spent resolving this dispute.

Dated: January 28, 2015

LEGAL AID SOCIETY

By: /s/Rachael Langston
RACHAEL LANGSTON

Attorney for Plaintiff
KUIANA TAYLOR

dated: January 28, 2015

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By: /s/Erik A. Rapoport
ERIK A. RAPOPORT
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CITY AND COUNTY OF SAN FRANCISCO

~~Proposed~~ ORDER

The Court has reviewed the Parties Stipulated Motion for Administrative Relief. Good cause appearing, and PURSUANT TO STIPULATION, IT IS SO ORDERED – The Parties may file a single letter outlining their respective positions regarding the City’s production of documents and identification of City employees receiving public assistance.

Dated: February 3, 2015

